

**Exhibit E**

**Estimated Staffing and Budget Plan**

**STAFFING PLAN FOR SULLIVAN & CROMWELL LLP, COUNSEL TO THE  
DEBTORS AND DEBTORS-IN-POSSESSION,  
FOR THE PERIOD NOVEMBER 1, 2023 THROUGH JANUARY 31, 2024**

<b>TIMEKEEPER CATEGORY</b>	<b>NUMBER OF TIMEKEEPERS EXPECTED TO WORK ON THE MATTER DURING THE APPLICATION PERIOD <sup>(1)</sup></b>	<b>RANGE OF RATES <sup>(1)</sup></b>
Partners	25	\$1,595.00 – \$2,375.00
Special Counsel, Of Counsel, Associates	75	\$775.00 – \$2,375.00
Non-Legal Personnel	40	\$195.00 – \$650.00

(1) Estimate is for total number of timekeepers billing any substantial number of hours to matter (not F.T.E.s).

(2) Includes clerks, legal analysts and eDiscovery professionals.

(3) Reflects rate increases due to matriculation or promotion during the interim fee period.

**ESTIMATED BUDGET FOR SULLIVAN & CROMWELL, COUNSEL  
TO THE DEBTORS AND DEBTORS-IN-POSSESSION,  
FOR THE PERIOD NOVEMBER 1, 2023 THROUGH JANUARY 31, 2024**

<b>PROJECT CATEGORY</b>	<b>ESTIMATED HOURS<sup>1</sup></b>	<b>ESTIMATED FEES<sup>2</sup></b>	<b>HOURS BILLED</b>	<b>FEES SOUGHT</b>
ASSET ANALYSIS AND RECOVERY	1,500.00	\$1,787,500.00	1,055.90	\$1,606,197.50
ASSET DISPOSITION	11,000.00	\$13,255,000.00	3,673.90	\$5,024,068.00
ASSUMPTION AND REJECTION OF LEASES AND CONTRACTS	150.00	\$178,750.00	4.30	\$6,137.00
AVOIDANCE ACTION ANALYSIS	5,400.00	\$6,435,000.00	6,049.30	\$7,790,318.50
BUSINESS OPERATIONS	900.00	\$1,072,500.00	259.30	\$376,896.00
CASE ADMINISTRATION	600.00	\$715,000.00	78.30	\$160,101.00
CLAIMS ADMINISTRATION AND OBJECTIONS	1,500.00	\$1,776,500.00	812.40	\$999,117.50
CORPORATE GOVERNANCE AND BOARD MATTERS	600.00	\$715,000.00	111.40	\$177,078.00
EMPLOYEE BENEFITS AND PENSIONS	375.00	\$446,875.00	117.90	\$158,986.50

<sup>1</sup> Estimated hours represent high-end of S&C's estimates of hours during the interim fee period.

<sup>2</sup> Estimated fees represent high-end of S&C's estimates of fees during the interim fee period.

PROJECT CATEGORY	ESTIMATED HOURS <sup>1</sup>	ESTIMATED FEES <sup>2</sup>	HOURS BILLED	FEES SOUGHT
EMPLOYMENT AND FEE APPLICATIONS (S&C)	300.00	\$357,500.00	256.50	\$304,508.00
EMPLOYMENT AND FEE APPLICATIONS (OTHERS)	225.00	\$268,125.00	81.60	\$112,380.50
FINANCING AND CASH COLLATERAL	60.00	\$71,500.00	-	\$0.00
OTHER LITIGATION	900.00	\$1,072,500.00	589.60	\$926,486.50
MEETINGS AND COMMUNICATIONS WITH CREDITORS	600.00	\$715,000.00	67.10	\$136,347.00
NON-WORKING TRAVEL	150.00	\$178,750.00	49.00	\$46,872.40
PLAN AND DISCLOSURE STATEMENT	12,500.00	\$14,932,500.00	2,067.40	\$2,839,250.00
RELIEF FROM STAY AND ADEQUATE PROTECTION	120.00	\$143,000.00	53.20	\$78,272.50
TAX	2,250.00	\$2,681,250.00	1,836.90	\$2,940,133.50
VALUATION	0.00	\$0.00	-	\$0.00
DISCOVERY	7,500.00	\$8,937,500.00	4,159.60	\$2,932,308.00
HEARINGS	250.00	\$299,750.00	63.70	\$117,675.50
FIRST AND SECOND DAY MOTIONS	0.00	\$0.00	28.40	\$59,679.00
CLAIMS INVESTIGATION	3,000.00	\$3,575,000.00	17.70	\$13,717.50
GENERAL INVESTIGATION	1,500.00	\$1,787,500.00	598.80	\$876,257.50
SCHEDULES, SOFAS AND REPORTING	45.00	\$53,625.00	12.20	\$22,224.00
OTHER MOTIONS/APPLICATIONS	2,250.00	\$2,681,250.00	604.60	\$871,706.50
TIME ENTRY REVIEW	1,800.00	\$759,000.00	822.50	\$0.00
BUDGETING	30.00	\$35,750.00	1.00	\$530.00
GENERAL REGULATORY	300.00	\$357,500.00	78.80	\$120,787.50
BAHAMAS MATTERS	1,800.00	\$2,145,000.00	649.10	\$848,390.00
FOREIGN DEBTOR MATTERS	2,250.00	\$2,681,250.00	637.80	\$1,129,500.50
COORDINATION WITH FOREIGN PROCEDURES	450.00	\$536,250.00	34.80	\$75,702.00
COORDINATION IN OTHER BANKRUPTCIES	1,950.00	\$2,323,750.00	242.30	\$274,352.50
INVESTIGATIVE REPORTS	600.00	\$715,000.00	3.00	\$4,104.50
CYBER ISSUES	1,050.00	\$1,251,250.00	355.50	\$554,019.50
<b>Total</b>	<b>63,905.00</b>	<b>\$74,941,625.00</b>	<b>25,473.80</b>	<b>\$31,584,104.90</b>